## Before the **Federal Communications Commission**

Washington, D.C. 20554

In the Matter of	)
	)
Revision of the Commission's Rules to )	CC Docket No. 94-102
Ensure Compatibility with Enhanced 911	)
Emergency Calling Systems	)
	)
Phase II Implementation Report	) TRS No. 809306

To: The Commission

## REPORT ON ENHANCED 911 PHASE II IMPLEMENTATION

SLO Cellular, Inc. ("SLO") hereby files this Report on Enhanced 911 Phase II Implementation, as required by the Commission's Third Report and Order, CC Docket No. 94-102, 14 FCC Rcd 17388 (1999). SLO is the Block A cellular carrier in California RSA No. 5 (San Luis Obispo).

## **Background/Contact Information:**

1. Carrier Identifying Information: SLO Cellular Inc.

TRS Number: 809306.

2. Contact Information: Stephen Kaffee, Esq.

Law Offices of Stephen Kaffee, P.C. 733 Fifteenth Street, N.W., Suite 700

Washington, D.C. 20005 Telephone: (202) 393-3655 Facsimile: (202) 393-3637 Email: skaffee@kaffeelaw.com

## **E911 Phase II Location Technology Information:**

1. <u>Type of Technology:</u> SLO has not selected the technology that it will use to meet its E911 Phase II obligations. Since it began offering cellular telephone service in [1992], SLO has been sharing the switch operated by the Block A carrier

in the Santa Barbara MSA, currently AT&T Wireless Services, Inc. ("AT&T").

Based on that relationship, SLO had intended to utilize the same technology that it switch-share partner adopted and did not conduct independent investigation or testing of available technologies.

Recently, AT&T informed SLO that AT&T intended to terminate the switch-share relationship between the carriers. Since receiving that notice, SLO has been working diligently to acquire and activate its own switch. SLO expects to complete the migration of its operations to its own switch by early 2001.

SLO intends to work with its switch vendor to determine which technology to use for the CA-5 system. SLO expects to make it choice of technology by the end of the first quarter of 2001 and to formulate and act upon an implementation schedule at that time. Accordingly, SLO cannot provide the Commission with details about its E911 system at this time. Once SLO has made a technology selection, it will inform the Commission in accordance with Section 20.18 of the Rules.

- 2. <u>Testing and Verification Method:</u> Because SLO has not yet selected a technology, it has not begun testing to verify Phase II capability. When SLO conducts testing, it will do so following applicable technical standards.
- 3. <u>Implementation Details and Schedule:</u> SLO cannot provide details regarding its schedule for implementing E911 capability. However, SLO intends to comply with all Commission regulations.
- 4. <u>PSAP Interface</u>: SLO intends to work with the PSAP to implement the appropriate PSAP interface for the technology that SLO selects.
- 5. <u>Existing Handsets:</u> Since SLO has not determined whether it will use a network, handset, or hybrid system, it cannot provide the Commission with a meaningful response regarding measure to be taken with respect to the upgrade and/or replacement of existing handsets.
- 6. <u>Location of Non-Compatible Handsets:</u> Since SLO has not determined whether it will use a network, handset, or hybrid system, it cannot provide the Commission with a meaningful response regarding the handling of non-compatible handsets.

7. Other Information: To date, SLO has not received a PSAP request regarding availability or implementation of Phase I or Phase II E911 capabilities. SLO is in regular contact with public safety officials throughout San Luis Obispo county and will work closely with such officials once they obtain the capability to utilize E911 information.

 $Respectfully \ submitted,$ 

SLO CELLULAR, INC.

By: \_\_\_\_\_

Stephen Kaffee Law Offices of Stephen Kaffee, P.C. Suite 700 733 Fifteenth Street, N.W. Washington, D.C. 20005 (202) 393-3655

**Its Attorney** 

November 29, 2000